

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,
Complainant**

-v-

**HO WAN KWOK, a/k/a “Miles Guo,”
“Miles Kwok,” “Guo Wengui,” “Brother
Seven,” or “The Principal,”**

and

KIN MING JE, a/k/a “William Je,”

and

YANPING WANG, a/k/a “Yvette,”

Defendants.

Criminal No.: 23-cr-118 (AT)

**PRO SE MOTION TO
INTERVENE AND REQUEST
FOR REDACTION**

Assigned to the Honorable U.S.
District Court Judge Analisa
Torres, Presiding Judge

To the Honorable Judge Analisa Torres:

My name is **Carolyn Sun**, and I respectfully move this Court to grant me the right to intervene **pro se** in the above-captioned case pursuant to Rule 24 of the Federal Rules of Civil Procedure.

I. Statement of Interest

I am a customer of **G Fashion** and **G Club**, which have been publicly identified in connection with the alleged fraudulent schemes under investigation in this case. As a customer, I have a direct financial and legal interest in the outcome of this case. As such, I am a concerned stakeholder who wishes to protect my rights and engage meaningfully in this case.

II. Purpose of Intervention

I am seeking to intervene to:

- File motions or letters with the Court as necessary to raise issues that impact customers of G Fashion and G Club;
- Protect any legal claims I may have to assets, restitution, or related proceedings;
- Communicate with the Court on matters relevant to my interests and concerns.

I do not intend to delay the proceedings or alter the direction of the case. Rather, I seek an active role in order to advocate for myself and potentially other similarly affected individuals.

III. Legal Justification

Pursuant to **Rule 24(a)**, intervention as of right is appropriate because:

- This motion is timely and does not prejudice the existing proceedings;
- I have a substantial interest in the outcome of this case;
- No current party adequately represents my interests, particularly as a customer of implicated entities.

Alternatively, under **Rule 24(b)**, permissive intervention is appropriate due to the overlap of factual and legal issues between my position and the subject matter of the case.

IV. Request for Redaction

For reasons of personal safety and privacy, I respectfully request that the Court permit the redaction of my **email address, mailing address, and telephone number** from the publicly filed version of this motion.

Should the Court require it, I am willing to provide full contact information under seal for use by the Court and relevant parties.

V. Relief Requested

Therefore, I respectfully request that the Court:

1. Grant my motion to intervene as a **pro se party**;
2. Recognize my standing to submit motions, letters, or other filings to the Court as appropriate;
3. Approve my request to redact personal contact information from the public record;
4. Grant any other relief the Court deems just and proper.

VI. Declaration

I, **Carolyn Sun**, declare under penalty of perjury that the statements made in this motion are true and correct to the best of my knowledge.

Date: 04/03/2025

Respectfully submitted,

Carolyn Sun



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